

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IYANNA DAVIS

Plaintiff,

-against-

DOCKET NO.: 11-CV-0076

**PLAINTIFF'S PROPOSED
JURY VOIR DIRE**

COUNTY OF NASSAU, NASSAU COUNTY
POLICE OFFICER MICHAEL CAPOBIANCO,
Serial #6971, SGT HERMANN, POLICE OFFICER
CARL CAMPBELL, POLICE OFFICER DWIGHT
BLANKENSHIP, POLICE OFFICER JOSEPH
GRELLA, POLICE OFFICER JOHN DOES #1-5,
NASSAU COUNTY DISTRICT ATTORNEY'S
OFFICE INVESTIGATOR THOMAS BIDELE,
NASSAU COUNTY DISTRICT ATTORNEY'S
OFFICE INVESTIGATORS JOHN DOES #2-5,
NASSAU COUNTY ASSISTANT DISTRICT
ATTORNEY JOHN DOES #1-5.

Defendants.
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On behalf of the Plaintiff, Iyanna Davis, the following Jury Voir Dire questions are submitted for this Court's consideration:

1. What is your name?
2. What is your date of birth?
3. Where is your place of birth?
4. In which city/village and county do you live?

FAMILY HISTORY

5. What is your marital status?
6. Do you have children?
If so, please state their respective ages, level of education or occupation.

7. Do you have any grandchildren?

If yes, how many? What are their ages? _____

For adult grandchildren, what are their occupations?

RESIDENCE

8. (a) How long have you lived at your current address?

(b) How long have you lived in that county?

(c) Do you own your residence?

(d) In what kind of residence to you live?

9. What other cities, towns, or areas have you lived in and for how long had you lived there?

10. How many people live in your household?

11. If persons other than your spouse/partner and children live with you, Please explain:

EMPLOYMENT

12. What is your current occupation/job title?

(a) Describe what you do:

(b) For how long?

(c) Name of employer?

13. What did you do prior to your current employment?

14. List the occupation and employers of any adult children:

15. Have you supervised other people at your present or past place of employment?

If yes, please describe the nature of your duties and the number of persons supervised:

16. In the course of your employment, are you or have you been required to write reports?

If yes, what type?

17. Have you been required to attend training courses in connection with your employment?

EDUCATION

18. What is the highest level of education that you have achieved?

a. What schools did you attend?

b. What degrees or certificates did you obtain?

19. Do you speak or read any other language in addition to English?

20. How many years of schooling did your spouse complete?

(a) What schools did he/she attend?

MILITARY SERVICE

21. Has any member of your family ever been in the military?

If so, who and in which branch?

CRIMINAL JUSTICE EXPERIENCE

22. Have you ever called the police for any reason?

Why?

23. (a) Have you, or has any close friend or relative, been the victim of, or witness to, any kind of crime, whether it was reported to law enforcement authorities or not (including robbery, burglary, assault, sexual assault, etc.)?

(b) How did you, or the person close to you, feel that the police or law enforcement agency handled the situation?

24. (a) If there was a court hearing as a result of the crime did you or any close friend or relative testify in court?

(b) Who?

(c) How did you feel about the experience?

25. Have you, or has any close friend or relative, ever been charged with a crime?

If yes, what was the charge and what was the outcome?

26. Have you ever had to appear in court, or in any court proceeding, as a plaintiff, defendant, victim, or witness for any reason other than you have indicated above?

If yes, please state when and explain why you appeared in court:

27. As a result of any experience described above, is there anything that would cause you to lean in favor of either the plaintiff or the defendants in this case?

If yes, please explain:

28. How serious a problem do you think crime is in your town?

29. Have you ever moved or considered moving because you thought crime was a problem? If so, please state why?

30. Have you taken any extra precautions to protect yourself, your family, or your home from crime? If so, what precautions have you taken?

31. Have you, or has someone you know, ever changed your behavior because of concern about becoming a crime victim? (For example, changed your commute route or time, decided not to go out alone at night, walked through a college campus with others rather than alone, etc.)

32. To your knowledge, is there a crime watch group in your neighborhood? If so, do you belong?

33. In your opinion, what are the major causes of crime?

34. (a) Have you, or has someone you know, ever been employed any law enforcement agency?

(b) Have you ever had any contact with anyone in any law enforcement agency through your work, in your neighborhood, or in your social life?

(c) Have you, or has someone you know, ever been employed in a

